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11 *Attorneys for Defendants*
 12 UBER TECHNOLOGIES, INC.,
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13
 14 **IN THE UNITED STATES DISTRICT COURT**
 15 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

16 IN RE: UBER TECHNOLOGIES, INC.,
 17 PASSENGER SEXUAL ASSAULT
 LITIGATION

18 This Document Relates to:

19 *Jaylynn Dean v. Uber Technologies, Inc., et al.*,
 20 3:23-CV-06708

Case No. 3:23-md-03084-CRB (LJC)

**STIPULATION AND [PROPOSED]
 ORDER TO PERMIT PROVISIONALLY
 FILING UNDER SEAL**

Judge: Hon. Charles R. Breyer
 Courtroom: 6-17th Floor

22 WHEREAS, on December 18, 2025, the Court entered a Stipulation and Order to extend
 23 the deadline for Uber to file its response to Plaintiff's Administrative Motion to consider whether
 24 the exhibits to Plaintiff's Omnibus Motions in Limine should be sealed until January 6, 2026. ECF
 25 4722.

26 WHEREAS, on December 30, 2025, Uber will file its opposition to Plaintiff's Omnibus
 27 Motions in Limine ("Uber MIL Opposition").

28 WHEREAS, the parties agree that Uber should be permitted to file the exhibits to Uber's
 STIPULATION TO PERMIT PROVISIONAL FILING
 UNDER SEAL

1 MIL Opposition provisionally under seal so that, for the convenience of both the parties and the
 2 Court, Uber can address the sealing of all of the motion in limine materials on January 6, 2026.
 3

4 WHEREAS, the parties therefore agree that Uber's motion to seal the exhibits to Uber's
 5 MIL Opposition should be due on January 6, 2026.
 6

7 WHEREAS, the Court has extended other deadlines in the case, but not this one.
 8

9 WHEREAS, the requested extension will have no bearing of the rest of the case schedule.
 10

11 THEREFORE, the parties respectfully request the Court enter the parties' stipulation
 12 permitting Uber to file the exhibits to Uber's MIL Opposition provisionally under seal and
 13 extending Uber's deadline to file its motion to seal those exhibits until January 6, 2026.
 14

15 **IT IS SO STIPULATED.**

16 DATED: December 19, 2025

17 Respectfully submitted,
 18

19 By: /s/ Laura Vartain Horn

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38 Dated: December 19, 2025

39 /s/ Andrew R. Kaufman

40 ANDREW R. KAUFMAN (*Admitted Pro Hac Vice*)

41 STIPULATION TO PERMIT PROVISIONAL FILING
 42 - 2 - UNDER SEAL
 43 CASE NO. 3:23-MD-03084-CRB

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26 *Co-Lead Counsel for Plaintiffs*

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: December 19, 2025

/s/ *Laura Vartain Horn*
Laura Vartain Horn

[PROPOSED] ORDER

IT IS SO ORDERED.

Dated: December __, 2025

Honorable Charles R. Breyer
United States District Judge